

### **REMARKS**

Claims 1-15 are currently pending in the application. Claim 1 is an independent claim, and claims 2-15 depend there from. Independent claim 1 is currently amended. Applicant respectfully requests that the application be reconsidered in view of the amendments set forth above and the following remarks.

In paragraph 2 on page 2 of the Office Action, independent claim 1 and dependent claims 2-7, 9-10 and 12 were rejected under 35 U.S.C. § 102(e) as being anticipated by McCormack et al. U.S. Patent 6,395,591 (McCormack). Applicant respectfully traverses the rejections for at least the following reasons.

Applicant sets forth in amended independent claim 1, a system for reducing noise in a chip. The system may comprise, among other things, a substrate layer integrated within the chip and a transistor layer integrated within the chip. The transistor layer may be shielded from said substrate layer by a shielding layer. The system may also comprise at least one transistor of a first transistor type that couples said transistor layer to said shielding layer and a positive potential of a quiet voltage source that is coupled to said at least one transistor of said first transistor type.

McCormack is different from Applicant's amended, independent claim 1. McCormack at least fails to disclose a "positive potential of a quiet voltage source" coupled to at least one transistor of a first transistor type, as set forth in Applicant's amended claim 1. Instead, McCormack teaches an analog ground connection (col. 3, lines 15-16), which is defined as an "electrical ground for circuitry built in P-well which are noise sensitive" (col. 3, lines 45-47). McCormack discloses n-channel transistors formed in the P-wells (col. 3, lines 3-6) where the analog ground is also referred to as the quiet ground and the digital ground is referred to as the noisy ground (col. 3, lines 53-55).

Applicant respectfully asserts that the analog ground (quiet ground) disclosed in McCormack is different from the "positive potential of a quiet voltage source" set forth in Applicant's amended claim 1.  $V_{DD}$  is the supply voltage applied at the drain terminal of a transistor, whereas  $V_{SS}$  is the supply voltage applied at the source terminal of a transistor.

Further,  $V_{DD}$  is a positive potential of a supply voltage or voltage source, whereas  $V_{SS}$  is maintained at ground (if not ground, then a negative supply voltage). Therefore, the term “quiet ground potential” or “ground voltage source GND” is referring to  $V_{SS}$ , which is equivalent to ground. One skilled in the art coming across the term “positive potential of a quiet voltage source” would not associate the description with  $V_{SS}$  because  $V_{SS}$  does not have a positive potential, but instead is coupled to ground.

The amendment to claim 1 does not add new matter to the application because, as explained above, those skilled in the art recognize that  $V_{DD}$  has a positive potential. Further, the “quieter voltage source  $V_{DD}$  140” is referred to throughout the specification (see paragraphs 16, 17, and 21) and is illustrated in Figure 2 of the drawings.

For at least the reasons set forth above, Applicant respectfully asserts that claim 1 is allowable over McCormack. Applicant requests that the rejection of claim 1 be withdrawn.

Because dependent claims 2-15 depend, directly or indirectly, from independent claim 1, and because claim 1 is allowable over McCormack, Applicant asserts that rejections of dependent claims 2-15 are now moot. Applicant asserts that claims 2-15 are also allowable over McCormack and requests that the rejections of claims 2-15 be withdrawn.

In paragraph 4 on page 3 of the Office Action, dependent claim 8 was rejected under 35 U.S.C. § 103(a) as being unpatentable over McCormack in view of Vinal U.S. Patent 5,151,759 (Vinal). Applicant respectfully traverses the rejections for at least the following reasons.

Vinal fails to remedy the deficiencies of McCormack. McCormack, even if combined with Vinal, is different from Applicant’s amended, independent claim 1. The proposed combination of McCormack and Vinal fails to disclose, among other things, a “positive potential of a quiet voltage source” coupled to at least one transistor of a first transistor type as set forth in Applicant’s amended claim 1. McCormack merely teaches an analog ground connection (see discussion and arguments set forth above). Vinal is silent regarding a “positive potential of a quiet voltage source” being coupled to at least one transistor of a first transistor type as set forth in Applicant’s amended claim 1. Thus, the combined references do not teach each and every limitation as set forth in Applicant’s amended claim 1.

For at least the reasons set forth above, Applicant respectfully asserts that claim 1 is allowable over the proposed combination of McCormack and Vinal. Applicants request that the rejection of claim 1 be withdrawn.

Because dependent claims 2-15 depend, directly or indirectly, from independent claim 1, and because claim 1 is allowable over the proposed combination of references, Applicant asserts that rejections of dependent claims 2-15 are now moot. Applicant asserts that claims 2-15 are also allowable over the cited references and requests that the rejections of claims 2-15 be withdrawn.

In paragraph 5 on page 4 of the Office Action, dependent claims 11 and 13 were rejected under 35 U.S.C. § 103(a) as being unpatentable over McCormack in view of Wei U.S. Patent 6,403,992 (Wei). Applicant respectfully traverses the rejections for at least the following reasons.

Wei fails to remedy the deficiencies of McCormack. McCormack, even if combined with Wei, is different from Applicant's independent claim 1. The proposed combination of McCormack and Wei at least fails to disclose a "positive potential of a quiet voltage source" coupled to at least one transistor of a first transistor type as set forth in Applicant's amended claim 1. McCormack merely teaches an analog ground connection (see discussion and arguments set forth above). Wei is silent regarding a "positive potential of a quiet voltage source" being coupled to at least one transistor of a first transistor type as set forth in Applicant's amended claim 1. Thus, the combined references do not teach each and every limitation as set forth in Applicant's amended claim 1.

For at least the reasons set forth above, Applicant respectfully asserts that claim 1 is allowable over the proposed combination of McCormack and Wei. Applicants request that the rejection of claim 1 be withdrawn.

Because dependent claims 2-15 depend, directly or indirectly, from independent claim 1, and because claim 1 is allowable over the proposed combination of references, Applicant asserts that rejections of dependent claims 2-15 are now moot. Applicant asserts that claims 2-15 are

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also allowable over the cited references and requests that the rejections of claims 2-15 be withdrawn.

In paragraph 6 on page 4 of the Office Action, dependent claims 14-15 were rejected under 35 U.S.C. § 103(a) as being unpatentable over McCormack in view of Puar et al. U.S. Patent 6,356,497 (Puar). Applicant respectfully traverses the rejections for at least the following reasons.

Puar fails to remedy the deficiencies of McCormack. McCormack, even if combined with Puar, is different from Applicant's amended independent claim 1. The proposed combination of McCormack and Puar at least fails to disclose a "positive potential of a quiet voltage source" coupled to at least one transistor of a first transistor type as set forth in Applicant's claim 1. McCormack merely teaches an analog ground connection (see discussion and arguments set forth above). Puar is silent regarding a "positive potential of a quiet voltage source" being coupled to at least one transistor of a first transistor type as set forth in Applicant's claim 1. Thus, the combined references do not teach each and every limitation as set forth in Applicant's amended claim 1.

For at least the reasons set forth above, Applicant respectfully asserts that claim 1 is allowable over the proposed combination of McCormack and Puar. Applicant requests that the rejection of claim 1 be withdrawn.

Because dependent claims 2-15 depend, directly or indirectly, from independent claim 1, and because claim 1 is allowable over the proposed combination of references, Applicant asserts that rejections of dependent claims 2-15 are now moot. Applicant asserts that claims 2-15 are also allowable over the cited references and requests that the rejections of claims 2-15 be withdrawn.

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**CONCLUSION**

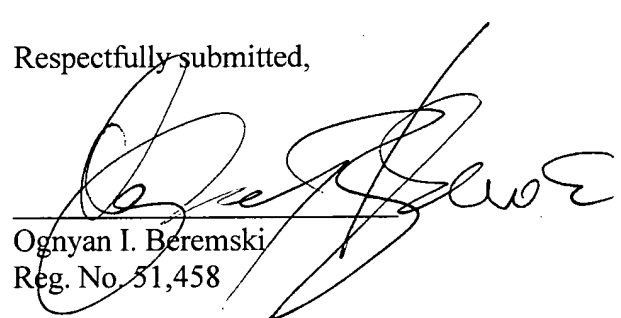
Based on at least the foregoing, it is respectfully submitted that the pending claims define allowable subject matter. Should anything remain in order to place the present application in condition for allowance, the Examiner is kindly invited to contact the undersigned at the telephone number listed below.

The Commissioner is hereby authorized to charge additional fee(s) or credit overpayment(s) to the deposit account of McAndrews, Held & Malloy, Account No. 13-0017.

A Notice of Allowance is courteously solicited.

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Respectfully submitted,

  
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